

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Eugene Westmoreland,	)	
	)	
Plaintiff,	)	No.: 23-cv-1851
	)	
v.	)	
	)	
Cook County Sheriff Thomas Dart, et al.	)	Judge John J. Tharp, Jr.
	)	
Defendants.	)	
	)	

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE  
TO DEPOSE AN INCARCERATED INDIVIDUAL**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 30(b)(2), and respectfully request leave to take the deposition upon oral examination of Plaintiff Eugene Westmoreland, who is confined in Taylorville Correctional Center, in Taylorville, Christian County, Illinois, and in support, state as follows:

1. Counsels for Plaintiff themselves advised Defendants on November 14, 2023, to file this Motion, and they have no opposition hereto.
2. Eugene Westmoreland is the Plaintiff in this case, which involves putative class claims, and individual claims, for which his individual testimony as a witness is crucial. Plaintiff's testimony will be also important for his putative class claims.
3. Specifically, Plaintiff's damages relate to his time as a detainee with the Cook County Department of Corrections.
4. As of September 26, 2023, Plaintiff was admitted to Taylorville Correctional Center, located at 1144 Illinois Route 29, Taylorville, IL 62568, following his guilty plea and subsequent conviction for the felony of Predatory Criminal Sexual Assault, under 720 ILCS 5/12-14.1(a)(1), in Case No. 19CR1642801.

5. Defendants now seek to depose Plaintiff regarding information and details related to his asserted claims.

WHEREFORE, the parties respectfully request that this Honorable Court enter an order allowing them to take the deposition of Plaintiff Eugene Westmoreland, currently detained at the Taylorville Correctional Center.

Respectfully Submitted,

**Defendants**

By: /s/ Jason E. DeVore  
Jason E. DeVore, One of the Attorneys  
for Defendants

**DEVORE RADUNSKY LLC**

Jason E. DeVore (ARDC # 6242782)  
Troy S. Radunsky (ARDC # 6269281)  
Zachary G. Stillman (ARDC # 6342749)  
230 W. Monroe Street, Ste. 230  
Chicago, IL 60606  
(312) 300-4479 telephone  
[jdevore@devorerdunsky.com](mailto:jdevore@devorerdunsky.com)  
[tradunsky@devorerdunsky.com](mailto:tradunsky@devorerdunsky.com)  
[zstillman@devorerdunsky.com](mailto:zstillman@devorerdunsky.com)

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that **Defendants' Motion for Leave to Depose an Incarcerated Individual** was filed on November 15, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman  
Zachary Stillman